

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**PENNYMAC LOAN SERVICES, LLC**

**PLAINTIFF**

**VS**

**CIVIL ACTION NO.: 2:19-cv-00193-HSO-MTP**

**INNOVATED HOLDINGS, INC. dba SITCOMM  
ARBITRATION ASSOCIATION; MARK MOFFETT;  
SANDRA GOULETTE; RONNIE KAHAPEA; MARK  
JOHNSON, KIRK GIBBS, BRETT "EEON" JONES aka  
EEON aka BRETT JONES aka BRETT TORIANO  
JONESTHEOPHILIOUS aka BRETT RANDOFF TORIANO  
KEEFFE HENRY KANA-SHAPHEL HITHRAPPE JONES-  
THEOPHILUS fka KEEFE BRANCH; and RANCE MAGEE**

**DEFENDANTS**

**APPLICATION TO CLERK FOR ENTRY OF DEFAULT  
RE: SANDRA GOULETTE AND SUPPORTING AFFIDAVIT**

The Plaintiff, PennyMac Loan Services, LLC, respectfully requests the Clerk to enter default against the Defendant, Sandra Goulette, in the above-captioned action for failure to answer or otherwise defend against the First Amended Complaint in this case, as set forth in the Affidavit attached hereto as Exhibit 1.

RESPECTFULLY SUBMITTED this the 22<sup>nd</sup> day of June, 2021.

UPSHAW, WILLIAMS, BIGGERS,  
& BECKHAM, LLP

By: /s/ Harris F. Powers III  
HARRIS F. POWERS III, MBN: 100331  
STEVEN C. COOKSTON, MBN: 99137  
Counsel for PennyMac Loan Services, LLC

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**CERTIFICATE OF SERVICE**

The undersigned Harris F. Powers III, counsel for Penny Mac Loan Services, LLC verifies that on this day he caused to be served a copy of this pleading by mailing same via U.S. Mail, postage prepaid, pursuant to F.R.C.P. 5, unto the following:

Ronnie Louis Marvel Kahapea  
P.O. Box 875  
Volcano, HI 96785

Sandra Goulette  
3007 Crescent Hill Drive  
Laurel, MS 39440

Mark Johnson  
451 May Lane  
Louisa, VA 23093

Kirk Gibbs  
4155 Lawrenceville Hwy, PMB 8119  
Lilburn, GA 30047

This the 22<sup>nd</sup> day of June, 2021.

/s/ Harris F. Powers III  
HARRIS F. POWERS III